

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

MARTHA FEDORIW,

Plaintiff,

v.

CIV. A. NO. 1:07-CV-7446 (HB)

CARL ZEISS VISION, INC., REED  
EXHIBITION COMPANIES, MAUK  
DESIGN, INC., PINNACLE EXHIBITS, INC.  
and NEW YORK CONVENTION CENTER  
OPERATING CORPORATION,

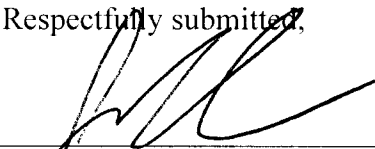
Defendants.

**NOTICE OF MOTION FOR  
ADMISSION OF ERIC J. GOLDBERG  
PRO HAC VICE**

PLEASE TAKE NOTICE that upon the accompanying Affidavit of Angelo A. Stio III, Esquire, executed on August 5, 2008, and the exhibits annexed thereto, Defendant Reed Elsevier, Inc. ("Reed") will move this Court, before the Honorable Harold Baer, Jr., United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on such date and at such time to be set by the Court, for an Order granting Eric J. Goldberg admission to this Court to argue and try the above-captioned action, in whole or in part, on behalf of Reed, pursuant to Local Civil Rule 1.3(c) of the United States District Court for the Southern District of New York.

Dated: Princeton, New Jersey  
August 5, 2008

Respectfully submitted,

  
Angelo A. Stio III (AS 7880)  
PEPPER HAMILTON LLP  
A Pennsylvania LLP  
301 Carnegie Center, Suite 400  
Princeton, NJ 08543-5276  
(609) 951-4125 (telephone)  
(609) 452-1147 (fax)

Attorneys for Defendant Reed Elsevier, Inc.

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

MARTHA FEDORIW,

Plaintiff,

v.

CARL ZEISS VISION, INC., REED  
EXHIBITION COMPANIES, MAUK  
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OPERATING CORPORATION,

Defendants.

CIV. A. NO. 1:07-CV-7446 (HB)

**MOTION FOR ADMISSION OF  
ERIC J. GOLDBERG *PRO HAC VICE***

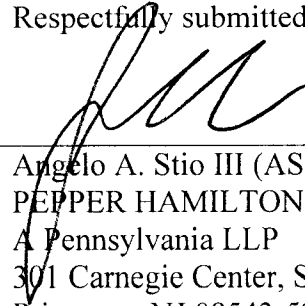
Pursuant to Local Rule 1.3(c), I, Angelo A. Stio III, a member in good standing of  
the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Eric J. Goldberg  
Pepper Hamilton LLP  
Suite 400  
301 Carnegie Center  
Princeton, NJ 08543-5276  
609.452.0808  
goldberge@pepperlaw.com

Eric J. Goldberg is a member in good standing of the Bar of the Commonwealth of Pennsylvania and the Bar of the State of New Jersey. There are no pending disciplinary proceedings against Eric J. Goldberg in any State or Federal Court.

Dated: Princeton, New Jersey  
August 5, 2008

Respectfully submitted,



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Angelo A. Stio III (AS 7880)  
PEPPER HAMILTON LLP  
A Pennsylvania LLP  
301 Carnegie Center, Suite 400  
Princeton, NJ 08543-5276  
(609) 951-4125 (telephone)  
(609) 452-1147 (fax)

Attorneys for Defendant Reed Elsevier, Inc.

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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CIV. A. NO. 1:07-CV-7446 (HB)

**AFFIDAVIT IN SUPPORT OF NOTICE  
OF MOTION FOR ADMISSION OF  
ERIC J. GOLDBERG *PRO HAC VICE***

Angelo A. Stio III, Esquire, being duly sworn, deposes and says:

1. I am a member of the bar of this Court and a partner at Pepper Hamilton LLP, counsel for Defendant Reed Elsevier, Inc. ("Reed") in this action. I submit this affidavit in support of Reed's application for an order granting Eric J. Goldberg *pro hac vice* admission to this Court to argue and try the above-captioned action, in whole or in part, on behalf of Reed, pursuant to Local Civil Rule 1.3(c).

2. Eric J. Goldberg is an associate at Pepper Hamilton LLP. He is admitted to practice before the courts of Pennsylvania and New Jersey. He has been and is a member in good standing of the Bar of the Commonwealth of Pennsylvania and the Bar of the State of New Jersey. His Certificate of Good Standing in the Bar of the Commonwealth of Pennsylvania is annexed hereto as Exhibit A. His Certificate of Good Standing in the Bar of the State of New Jersey is annexed hereto as Exhibit B.

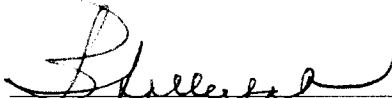
3. Pursuant to Local Civil Rule 1.3(c), I request that Eric J. Goldberg be permitted to argue and try the above-captioned case.

4. Attached as Exhibit C is a proposed Order granting this motion.


5. There has been no prior application in this case for the *pro hac vice* admission of Eric J. Goldberg.

WHEREFORE, it is respectfully requested that this Court grant Eric J. Goldberg *pro hac vice* admission to the bar of this Court for the purpose of arguing and trying this case.

Sworn to before me this  
29 day of August, 2008.

  
Notary Public

**PATRICIA A. HOLLERBACH**  
NOTARY PUBLIC OF NEW JERSEY  
MY COMMISSION EXPIRES JULY 11, 2010

  
Angelo A. Stio III (AS 7880)  
PEPPER HAMILTON LLP  
A/Pennsylvania LLP  
301 Carnegie Center  
Suite 400  
Princeton, NJ 08543-5276  
(609) 951-4125 (telephone)  
(609) 452-1147 (fax)

Attorneys for Defendant Reed Elsevier, Inc.



Supreme Court of Pennsylvania

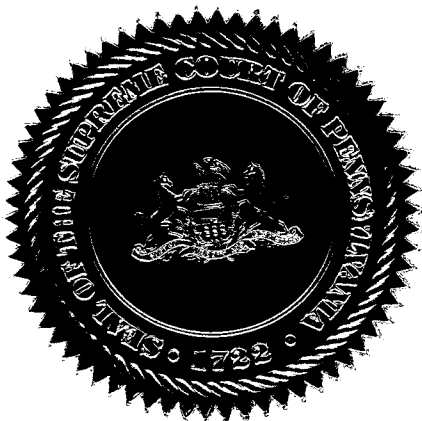
**CERTIFICATE OF GOOD STANDING**

***Eric Jay Goldberg, Esq.***

**DATE OF ADMISSION**

***December 2, 2005***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: July 25, 2008

A handwritten signature in cursive script, reading "Patricia A. Johnson".

Patricia A. Johnson  
Chief Clerk

# Supreme Court of New Jersey

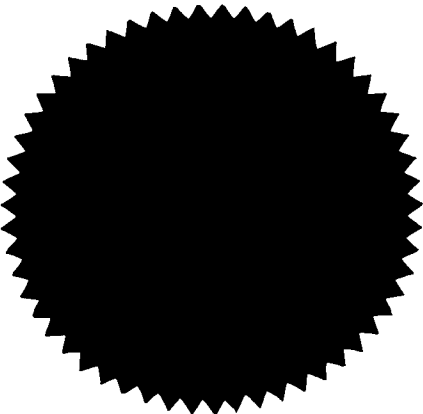


## Certificate of Good Standing

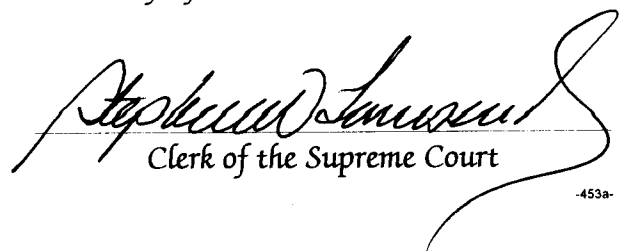
This is to certify that **ERIC JAY GOLDBERG**  
(No. **042072006** ) was constituted and appointed an Attorney at Law of New  
Jersey on **February 21, 2008** and, as such,  
has been admitted to practice before the Supreme Court and all other courts of this State  
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in  
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"  
if the Court's records reflect that the attorney: 1) is current with all assessments  
imposed as a part of the filing of the annual Attorney Registration Statement, including,  
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client  
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not  
resigned from the Bar of this State; and 4) has not been transferred to Disability  
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's  
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to  
practice law in this State.*



In testimony whereof, I have  
hereunto set my hand and  
affixed the Seal of the  
Supreme Court, at Trenton, this  
24TH day of July , 20 08

  
Clerk of the Supreme Court

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

MARTHA FEDORIW,

Plaintiff,

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CARL ZEISS VISION, INC., REED  
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DESIGN, INC., PINNACLE EXHIBITS, INC.  
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OPERATING CORPORATION,

Defendants.

CIV. A. NO. 1:07-CV-7446 (HB)

**ORDER FOR ADMISSION OF  
ERIC J. GOLDBERG *PRO HAC VICE***

IT IS HEREBY ORDERED, this \_\_\_\_ day of \_\_\_\_\_, 2008, upon the motion of Defendant Reed Elsevier, Inc. ("Reed") for an Order pursuant to Local Civil Rule 1.3(c) granting *pro hac vice* admission to Eric J. Goldberg in connection with the above-captioned case, and upon consideration of the motion and the affidavit in support thereof, it is ORDERED that

Eric J. Goldberg  
Pepper Hamilton LLP  
Suite 400  
301 Carnegie Center  
Princeton, NJ 08543-5276  
609.452.0808  
goldberge@pepperlaw.com

is granted *pro hac vice* admission to the bar of this Court for the purpose of participating in, arguing and trying this action on behalf of Defendant Reed Elsevier, Inc. ("Reed"). If counsel does not already have an ECF password, he shall promptly apply for one at [nysd.uscourts.gov](http://nysd.uscourts.gov).

Dated: New York, New York  
\_\_\_\_\_, 2008

\_\_\_\_\_  
Harold Baer, Jr.  
United States District Judge



**CERTIFICATE OF SERVICE**

I hereby certify that on August 6, 2008, the foregoing Notice of Motion for Admission of Eric J. Goldberg *Pro Hac Vice*, Motion, supporting Affidavit, and proposed Order were served upon the following counsel via First Class U.S. Mail:

Peter A. Greiner, Esquire  
MEYERSON & O'NEILL  
1700 Market Street  
Suite 3025  
Philadelphia, PA 19103


Stavros E. Sitinas, Esquire  
WINGATE, RUSSOTTI & SHAPIRO, LLP  
420 Lexington Avenue  
Suite 2750  
New York, New York 10170

Peter H. Cooper, Esquire  
BIEDERMANN, HOENIG, MASSAMILLO & RUFF, P.C.  
570 Lexington Avenue, 16<sup>th</sup> Floor  
New York, New York 10016

Gregory T. Walthall, Esquire  
HOEY, KING, TOKER & EPSTEIN  
55 Water Street, 29th Floor  
New York, NY 10041

Heidi M. Weiss, Esquire  
LAW OFFICES OF EDWARD GARFINKEL  
110 William Street, 17<sup>th</sup> Floor  
New York, New York 10038

Eric B. Betron, Esquire  
KELLY, RODE & KELLY, LLP  
330 Old Country Road, Suite 305  
Mineola, NY 11501



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Angelo A. Stio (AS 7880)